

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

ANN LEDFORD, individually and as next)	
friend and mother of Johnathan Binkley,)	
Deceased,)	
)	
Plaintiff,)	
v.	:	Case No. 3:20-CV-325
)	
KNOX COUNTY, TENNESSEE,)	JURY DEMANDED
et al.,)	
)	
Defendants.)	

NOTICE OF MANUAL FILING OF EXHIBITS
TO SECOND AMENDED COMPLAINT

Plaintiff Ann Ledford, through counsel, respectfully gives notice that Exhibits B-H, and Q to the Second Amended Complaint are being manually filed on the attached thumb drive per the Court Clerk's instructions. The exhibits consist of:

1. True copies of excerpts from the body camera videos of Deputies Bradshaw, Harrell, and Burnett taken at the scene during the events generally referenced above from the time when deputies first approached the pickup truck through the time Mr. Binkley was pulled by deputies through the driver's side window of the pickup truck are attached as **Collective Exhibit B**;¹

2. True copies of excerpts from the body camera videos of Deputies Bradshaw, Burnett, Bales, May, Jones, Gomez, Farmer, and Sosville taken at the scene during the events

¹ In Exhibits B, C, D, E, and H, captions have been added to these excerpts that accurately reference the events shown, identify the deputy's body camera video from which each excerpt was taken, quote or summarize statements made during the events shown, and identify the person making each of the referenced statements.

referenced above from the time after Mr. Binkley was pulled through the driver's side window of the pickup truck until the time when deputies moved Mr. Binkley from the ground beside the pickup truck to a gravel road a short distance away are attached as **Exhibit C**;

3. True copies of excerpts from the body camera videos of Deputies Farmer, Gomez, and Jones taken at the scene during the events generally referenced above from the time when Mr. Binkley was placed by deputies on part of a gravel road at the scene through the time just before Mr. Binkley's hands and feet were bound together behind his back while he was lying on the gravel road are attached as **Exhibit D**;

4. True copies of excerpts from the body camera videos of Deputies Gomez, Doss, Bales, and Farmer taken at the scene during the events generally referenced above from the time when Mr. Binkley's hands and feet were bound together behind his back while he was lying on the gravel road through the time when Mr. Binkley appeared to lose consciousness are attached as **Exhibit E**;

5. True copies of the bodycam footage from deputies Bradshaw, Harrell, Burnett, May, and Bales are attached as **Collective Exhibit F**;

6. A true copy of the bodycam footage of Deputy Gomez is attached as **Exhibit G**;

7. A compilation of excerpts from the body camera videos of several of the deputies' body camera videos during the events generally referenced above from the time when deputies first arrived on the scene through the time when Mr. Binkley appeared to lose consciousness is attached as **Exhibit H**; and

8. True copies of excerpts of research journals discussing the dangers of positional asphyxia are attached as **Collective Exhibit Q**.

Respectfully submitted this 28th day of December, 2020.

By: s/Wayne A. Ritchie II
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing is being served on the parties below by hand-delivery on December 28, 2020, or as soon thereafter is practicable, to the City County Building, 400 Main Street, Knoxville, Tennessee 37902.

David S. Wigler, Esq.
Knox County Law Department
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Attorney for Defendants

s/Wayne A. Ritchie, II

WAYNE A. RITCHIE, II